

REMARKS

Claim 1 calls for handling system-wide state of a wireless device. There is no discussion of system-wide state. The Examiner is respectfully requested to point out precisely where in the cited reference there is some discussion of handling the system-wide state of the wireless device. In the previous office action (on page 4), paragraphs 31-34, were cited in Travostino. A review of that material indicates no discussion whatsoever of system-wide state of a wireless device.

Nor is there any discussion of any reason to believe the host controller interface firmware handles the system-wide state of the wireless device. The first discussion of the item 204, indicated to be host controller interfaced firmware, is in paragraph 9 where it is stated that it is for sending and receiving protocol messages over the wireless medium. How this can be used to deduce that the system-wide state of the wireless device is handled through the host controller interface hardware is never explained.

The only other mention of the HCI firmware 204, in the cited paragraphs 31-34, is in paragraph 32. In paragraph 32 all that is stated is that the firmware is for sending and receiving protocol messages over the wireless medium. Thus, the rejection seems to be without support.

Further, the claim calls for handling the state of each link with the device through a link manager firmware. It is suggested that this is somehow taught in paragraphs 31-34. However, it is never indicated what is the asserted link manager firmware in the cited reference. There is no discussion of any link manager firmware in paragraphs 31-34. Again, it appears that there is no support for the rejection.

In connection with the rejection of a different claim, claim 4, it is indicated that the link manager firmware is 226 and 204. But 204 is the HCI firmware. The claim is explicit that different things handle the state of each link in the system-wide state. The rejection assumes that the same thing does both, indicating that it is not possible that the cited reference teaches the claimed invention.

Moreover, there is no indication that the HCI firmware 204 handles either the system-wide state or the state of each link. Finally, there is no indication that item LMP 210 is the missing link manager firmware. The only cited material is, again, in paragraphs 31-34, which only mentions the LMP logic 232, but never says a thing about it. See paragraph 34. The additional comments in the first full paragraph of page 5 are noted, but they seem to have

nothing whatsoever to do with indicating where the claimed elements are in the cited references. The fact that the HCI firmware sends and receives protocol messages is clearly noted there, but sending messages has nothing to do with the claimed invention.

Finally, for the first time, it is indicated that something in Figure 3 indicates handling the system-wide by interfacing with wireless medium 104. Certainly, any independent review of Figure 3 would demonstrate that that figure is entirely non-informing on the topic.

Most surprising is the accusation that the Applicants' remarks amount to a general allegation that the claims define a patentable subject matter without specifically pointing out how the language of the claims patentably distinguishes. To the contrary, specific terms in the claims have been repeatedly pointed to and it has been shown that these elements are not taught.

Since there is no support for the rejection, the rejection should be reconsidered.

Respectfully submitted,

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